1 2 3 4 5	EVE H. WAGNER (State Bar No. 126471) ANTHONY D. SBARDELLATI (State Bar No. 246431) SAUER & WAGNER LLP 1801 Century Park East, Suite 1150 Los Angeles, California 90067 Tel: (310) 712-8100; Fax: (310) 712-8108 E-mail: ewagner@swattys.com; asbardellati@swattys.com JEREMY FEIGELSON (of counsel) BRUCE P. KELLER (of counsel) DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, New York 10022 Tel: (212) 909-6000; Fax: (212) 909-6836 Email: jfeigelson@debevoise.com; bpkeller@debevoise.com	
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9	Attorneys for Defendant Prometheus Global Media, LLC	
10	UNITED STATES DISTRICT COURT	
11	CENTRAL DISTRICT OF CALIFORNIA	
12	CENTRAL DISTRICT OF CALIFORNIA	
13	PENSKE MEDIA CORPORATION, dba PMC, a Delaware corporation,	Case No.: CV 11-7560-JST (MRW)
14	Plaintiff,	Hon. Josephine Staton Tucker Magistrate: Hon. Michael R. Wilner
15)	DISCOVERY MATTER:
16 17	PROMETHEUS GLOBAL MEDIA,	PROPOSED ORDER GRANTING DEFENDANT PROMETHEUS
18	company d/b/a hollywoodreporter.com; and DOES 1 through 10 inclusive	GLOBAL MEDIA, LLC'S MOTION TO COMPEL FURTHER RESPONSES TO WRITTEN
19	Defendants.	DISCOVERY PROPOUNDED TO PLAINTIFF PENSKE MEDIA
20	<u> </u>	CORPORATION
21)	DECLARATION OF ANTHONY SBARDELLATI AND NOTICE OF MOTION AND JOINT
22		STIPULATION (filed concurrently)
23		Action filed: September 14, 2011 Trial Date: July 9, 2013
24	\(\)	Hearing Date: January 9, 2012
25		<i>y</i> • 7 • •
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27		
28	[PROPOSED] ORDER	

The Motion of Defendant Prometheus Global Media LLC ("Prometheus") to		
Compel Further Responses to Written Discovery Propounded to Penske Media		
Corporation ("Penske") came for a regularly scheduled hearing on January 9, 2012 at		
9:30 a.m. at the United States District Court for the Central District of California, located		
at 312 North Spring Street, Los Angeles, CA 90012, Courtroom H (9th Floor). Eve		
Wagner of Sauer & Wagner LLP appeared for Prometheus appeared on		
behalf of Penske. Having considered the motion, the Joint Stipulation, declarations and		
exhibits submitted therewith, and the facts and arguments presented at the hearing on		
Prometheus's Motion to Compel, and finding GOOD CAUSE therefore, the Court hereby		
GRANTS the relief requested by Prometheus and issues the following ORDER:		
(1) The Court hereby orders Penske to provide a further and complete response as		
specified in the motion without objection to the interrogatories numbered 1-2 in		
Prometheus's First Set of Interrogatories within ten business days of this Order.		
(2) The Court hereby orders Penske to provide a further and complete response as		
specified in the motion without objection to, and to produce documents responsive to,		
Prometheus's requests for production of documents numbered 1-4 in Prometheus's First		
Set of Requests for Production within ten business days of this Order.		
DATED:, 2013		
Hon. Michael R. Wilner United States Magistrate Judge		
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[PROPOSED] ORDER		